

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

LAJERRAN LONG

Defendant

CRIMINAL No. 20-cr-10308-MLW

**SENTENCING MEMORANDUM
SUPPLEMENTAL FILING**

INTRODUCTION

At the request of U.S. Probation and for the convenience of the Court, the government provides this supplemental filing describing how the above-captioned case is connected to “related cases”. All information in this filing is summarized from information available in the charging documents filed on the public dockets in these cases.

The following cases were the result of investigations into bank fraud conspiracies that targeted multiple financial institutions, including Santander Bank, TD Bank, Citizens Bank, and Bank of America. The cases are provided in alphabetical order by last name of the defendant:

1. Carlyann Amos (19-cr-10355-DPW)
2. Akeem Chambers (18-cr-10054-RWZ)
3. Emelyn Clough (21-cr-10171-FDS)
4. Lindsley Georges and Dave Guillaume (19-cr-10408-ADB)
5. Emeka Iloba (21-cr-10233-LTS)
6. Judemario Josaphat (21-cr-10044-DJC)
7. Fesnel Lafortune (19-cr-10246-DPW)

8. Lajerran Long (20-cr-10308-MLW)
9. Antonio Niati (18-cr-10341-MLW)
10. Valnardia Novas (20-cr-10221-DPW)

The schemes in these cases sought to withdraw funds, in the form of checks and cash, from victim accounts at several banks. The fraudulently-obtained funds were then negotiated through accounts at other financial institutions that had been opened in the names of fictitious business entities. The participants in this scheme primarily included the following categories: (1) individuals that developed the scheme (*e.g.*, directed planning and recruitment); (2) individuals who were paid to go into banks and present falsified credentials to obtain funds from victim accounts; (3) bank tellers that were recruited to facilitate the fraudulent transfer of funds by accepting the falsified credentials without scrutiny; and (4) money launderers that opened accounts in the names of fictitious business entities that were used to negotiate the fraudulently-obtained funds.

Notably, the government has not uncovered evidence that each co-conspirator—including the defendants in the cases referenced above—knew all other co-conspirators and/or the conduct of the broader conspiracy. Below is a summary of available information describing the defendants' conduct, how the cases are connected, and the procedural posture of each case.

CASE SUMMARIES

1. Carlyann Amos (19-cr-10355-DPW)

a. Fact Summary

Amos was a bank teller at Santander Bank (Weymouth, Massachusetts). Amos was initially recruited by Long, and later by Josaphat. Amos's role was to accept fake credentials

presented to her, without scrutiny, in order to facilitate the fraudulent transfer of money. Amos did this on multiple occasions between December 2017 and January 2018.

b. Procedural Posture

Amos pleaded guilty to a two-count Information charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy) and 18 U.S.C. §§ 1028A and 2 (Aggravated Identity Theft; Aiding and Abetting). Amos's sentencing is scheduled for December 2, 2021 in front of Judge Woodlock.

2. Akeem Chambers (18-cr-10054-RWZ)

a. Fact Summary

Chambers was a bank teller at Santander Bank (Dorchester, Massachusetts). Chambers was recruited by Niati to facilitate fraudulent withdrawals from accounts at Santander Bank. Chambers facilitated those withdrawals on multiple occasions in April 2017.

b. Procedural Posture

Chambers pleaded guilty to one-count Information charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy). Chambers was sentenced by Judge Zobel on September 28, 2021, to time served, three years of supervised release (the first six months in home confinement with electronic monitoring), and restitution of \$360,891 (joint and several with other applicable defendants to be identified in a subsequent order).

3. Emelyn Clough (21-cr-10171-FDS)

a. Fact Summary

Between approximately June 2017 and November 2017, Clough conspired with Iloba, Novas, Guillaume, and others. At Iloba's direction, Clough opened a bank account at Citizens Bank in the name of a fictitious business that was used to negotiate fraudulently-obtained checks from other banks, and also deposited fraudulently-obtained funds into accounts in the names of

fictitious businesses. Clough and Iloba also coordinated with Guillaume to launder funds, and recruited Novas (bank teller at TD Bank) to facilitate fraudulent withdrawals from customer accounts.

b. Procedural Posture

Clough has agreed to plead guilty to a one-count Information charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy). Clough's Rule 11 change-of-plea hearing is scheduled for December 8, 2021.

4. Lindsley Georges and Dave Guillaume (19-cr-10408-ADB)

a. Fact Summary

Between approximately December 2017 and January 2018, Georges and Guillaume coordinated with Iloba and/or Clough (but primarily Iloba) to launder the proceeds from bank fraud. Guillaume opened bank accounts in the names of fictitious businesses using falsified identification documents. Both Guillaume and Georges were also provided fraudulently obtained funds, deposited those funds into the accounts opened in the names of fictitious businesses, and withdrew a portion of those funds.

b. Procedural Posture

Georges and Guillaume both pleaded guilty to a one-count Indictment charging 18 U.S.C. § 1956(h) (Money Laundering Conspiracy). Georges's and Guillaume's sentencing hearings are both scheduled for January 6, 2022 in front of Judge Burroughs.

5. Emeka Iloba (21-cr-10233-LTS)

a. Fact Summary

Between approximately April 2017 and March 2018, Iloba conspired with Clough, Guillaume, Niati, Novas, and others. Iloba directed Clough to open bank accounts at Citizens

Bank in the name of a fictitious entity using a counterfeit means of identification. Iloba and Clough recruited Novas (bank teller at TD Bank) to facilitate fraudulent withdrawals from customer accounts. Iloba also coordinated with Guillaume and/or Georges to open business accounts at Santander bank and Citizens Bank in the name of fictitious entities and to process fraudulently-obtained checks through those accounts.

Iloba also introduced Niati to other participants in the scheme and facilitated the provision of fraudulent identification documents to Niati for the purpose of carrying out the scheme. Niati, in turn, recruited Chambers (bank teller at Santander Bank) to facilitate fraudulent withdrawals from customer accounts, as well as Lafortune (money launderer) to create accounts in the names of fictitious businesses.

b. Procedural Posture

Iloba pleaded guilty to a two-count Information charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy) and 18 U.S.C. §§ 1028A and 2 (Aggravated Identity Theft; Aiding and Abetting). Iloba's sentencing is scheduled for December 16, 2021 before Judge Sorokin.

6. Judemario Josaphat (21-cr-10044-DJC)

a. Fact Summary

Between approximately December 2017 and February 2018, Josaphat conspired with Long, Amos, and others. Josaphat obtained an introduction to Amos (bank teller at Santander Bank) through Long (Amos's acquaintance). Josaphat paid Long for the introduction to Amos, and also paid Amos to facilitate fraudulent transfers from victim accounts at Santander Bank.

b. Procedural Posture

Josaphat has agreed to plead guilty to a two-count Indictment charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy) and 18 U.S.C. §§ 1028A and 2 (Aggravated Identity Theft; Aiding and Abetting). Josaphat's Rule 11 change-of-plea hearing is scheduled for November 10, 2021.

7. Fesnel Lafortune (19-cr-10246-DPW)

a. Fact Summary

In approximately April 2017, Lafortune worked with Niati to open business accounts at TD Bank using fraudulent identification documents. Those business accounts were used to launder the funds obtained from Santander Bank customers. Lafortune was recruited by Niati to participate in this scheme.

b. Procedural Posture

Lafortune pleaded guilty to a two-count Indictment charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy) and 18 U.S.C. § 1028A (Aggravated Identity Theft). Lafortune was sentenced by Judge Woodlock on June 25, 2021 to: (1) on Count One, seven months imprisonment, five years supervised release, and \$201,400.95 in restitution, and (2) on Count Two, twenty-four months confinement, consecutive to the term imposed in Count One, and one year of supervised release, concurrent with the term imposed in Count One.

8. Lajerran Long (20-cr-10308-MLW)

a. Fact Summary

Between approximately December 2017 and January 2018, Long conspired with Josaphat and Amos. Long introduced Josaphat to Amos (bank teller at Santander Bank) and facilitated a payment to Amos.

b. Procedural Posture

Long pleaded guilty to a one-count Information charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy). Long's sentencing is scheduled before Judge Wolf on October 19, 2021.

9. Antonio Niati (18-cr-10341-MLW)

a. Fact Summary

Iloba brought Niati into the scheme and provided Niati fraudulent identification documents. In approximately April 2017, Niati recruited Lafortune to open bank accounts in the names fictitious business entities and facilitated the provision of fake identification documents to Lafortune. Niati also recruited Chambers (a bank teller) to facilitate fraudulent withdrawals from accounts at Santander Bank.

b. Procedural Posture

Niati pleaded guilty to a two-count Information charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy) and 18 U.S.C. §§ 1028A and 2 (Aggravated Identity Theft; Aiding and Abetting). Niati's sentencing will be before Judge Wolf but the date has not yet been scheduled.

10. Valnardia Novas (20-cr-10221-DPW)

a. Fact Summary

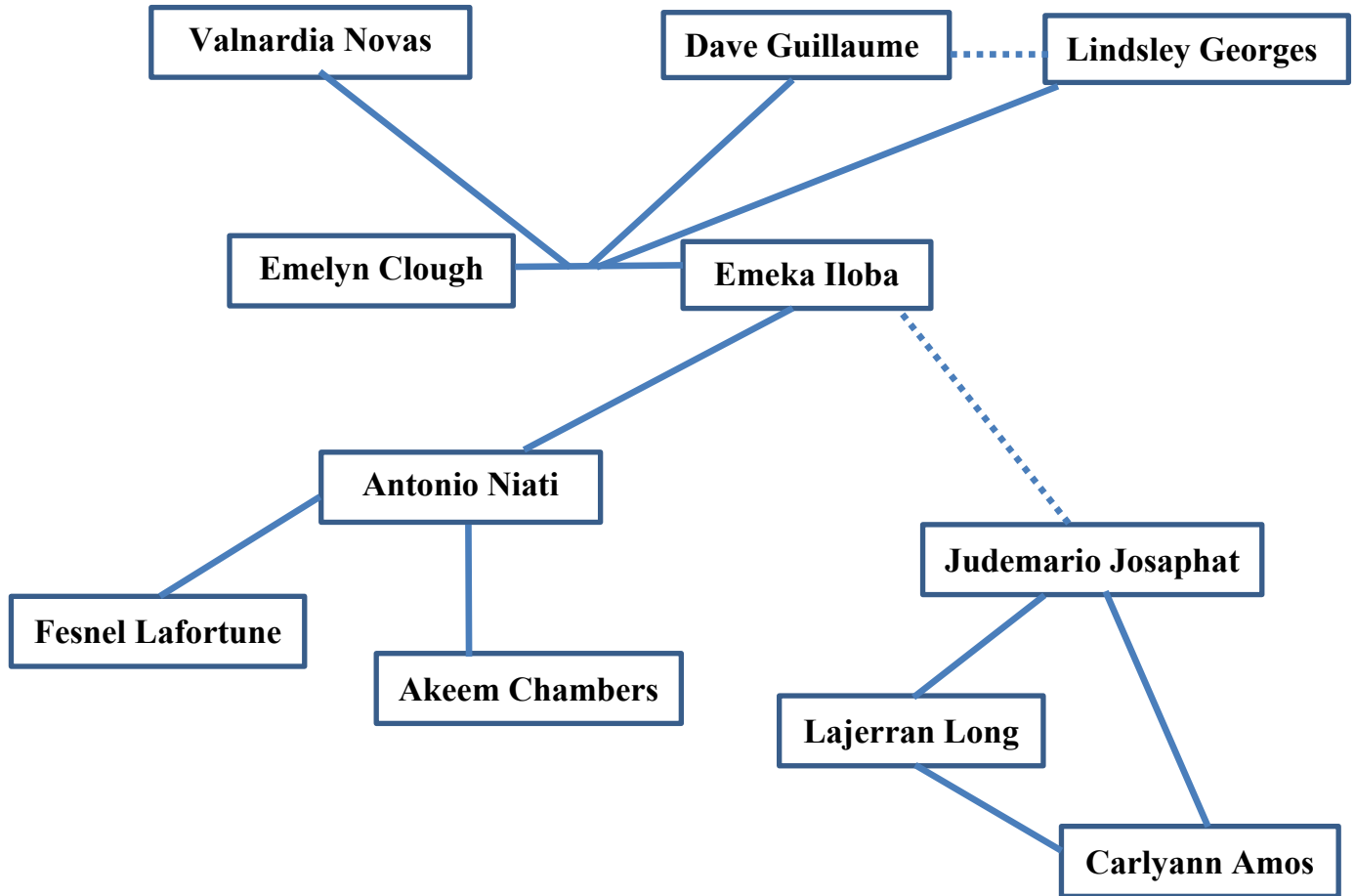
Between approximately August 2017 and October 2017, Novas conspired with Clough and Iloba as part of this scheme. Novas was a bank teller at TD Bank who was recruited by Clough and Iloba to facilitate fraudulent withdrawals from customer accounts.

b. Procedural Posture

Novas pleaded guilty to a one-count Information charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy). Novas's sentencing is scheduled before Judge Woodlock on October 21, 2021.

DIAGRAM

(VISUAL DEPICTION OF KNOWN RELATIONSHIPS)



Relationships identified in charging documents



Relationships inferred from charging documents

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Christopher J. Markham
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Assistant United States Attorney

Date: October 17, 2021